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August 30, 1993

Mr. John L. Jones (6 H-MA) U. S. EPA Region VI 1445 Ross Avenue, Ste. 1200 Dallas, TX 75202

Re: Preliminary Assessment Prepared by the Arkansas Department of Pollution Control and Ecology for ZENECA Inc. (f/k/a ICI Americas Inc.), North Little Rock, Arkansas

Dear Mr. Jones:

I am writing this letter on behalf of ZENECA, Inc., formerly known as ICI Americas Inc., in order to provide you with the enclosed comments to the Preliminary Assessment report previously submitted to EPA by the Arkansas Department of Pollution Control and Ecology with regard to the ("ICI Burial Pit") at ZENECA's North Little Rock, Arkansas facility.

It is my understanding from my telephone conversation with you in June and conversations I have had with Tammie Hynum with the Arkansas Department of Pollution Control & Ecology that EPA has requested that a contractor perform a Site Inspection Prioritization for this site. If that is correct, I would appreciate if you would forward to the contractor the additional copy of ZENECA's comments which I am also enclosing, as the comments include important corrections and clarifications to the facts described in ADPC&E's Preliminary Assessment report.

Also, I would appreciate if you would identify for me any EPA guidance documents or memoranda which describe the prioritization process so that I can obtain copies of those documents from EPA. Additionally, I am requesting that you please notify me as soon as the Site Prioritization Report is completed by the contractor so that I can obtain a copy of that report on behalf of ZENECA. We remain hopeful that EPA's current investigation into this matter will result in a finding that no further evaluation for remedial action at this site is necessary.

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I appreciate your cooperation and assistance in this matter. Should you have any questions concerning this letter or the enclosed comments, please feel free to contact me at your convenience.

Sincerely yours,

BANKS, DODSON & GOODHART

JFG:pf

cc: Ms. Tammie J. Hynum

Arkansas Department of Pollution Control & Ecology